

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

-----	x	
Luann Gould,	:	
	:	
Plaintiff,	:	05 CV 11118 (PBS)
	:	
— v. —	:	
	:	ASSENTED TO MOTION TO
Lucent Technologies, Inc.,	:	EXTEND DISCOVERY
	:	DEADLINE BY 60 DAYS
	:	
Defendant.	:	
-----	x	

The Plaintiff and the Defendant respectfully request the Court to extend the discovery deadline of December 21, 2005 in this case by 60 days.

The immediate purpose for the extension is to accommodate the scheduling of the Plaintiff's deposition. Under the current discovery deadline, the Plaintiff is scheduled to be deposed on December 15, 2005, at which time her attorneys are scheduled to be in state court for trial.

Given the upcoming holidays, an extension of 60 days for discovery should be sufficient to permit scheduling of the Plaintiff's deposition and to enable the scheduling of other discovery, if needed, by either the Plaintiff or Defendant.

Respectfully Submitted,

HARVEY & KLEGER

By: /s/ Robert R. Thomas

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